



# Center for Disability Advocacy Rights (CeDAR), Inc.

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**USDC SDNY**  
**DOCUMENT**  
**ELECTRONICALLY FILED**  
**DOC #:** \_\_\_\_\_  
**DATE FILED:** 1/7/2020

Via ECF

Hon Barbara C. Moses  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

January 7, 2020

**MEMO ENDORSED**

Re: Martinez v. Saul  
1:19-cv-06515-BCM

Dear Judge Moses:

As the attorney for the above plaintiff in the above captioned case, I write to request approval of the proposed briefing schedule. This is plaintiff's second request for an extension of time and is made with the consent of, and in consultation with, opposing AUSA Joseph Pantoja.

I seek an extension of time due to personal reasons. My father died in December after a long illness and I have had to take time off to tend to his services and my mother's needs over the past several weeks. I remain behind schedule on this and other cases. With the kind consent of opposing counsel, AUSA Joseph Pantoja., I respectfully request that the Court extend and approve the following revised briefing schedule:

January 14, 2020	Plaintiff's settlement letter
February 13, 2020	Stipulation of Dismissal or No Settlement Joint Letter
March 16, 2020	Plaintiff's Motion for Judgment on the Pleadings
May 15, 2020	Defendant's Motion for Judgment on the Pleadings
June 4, 2020	Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J.  
January 7, 2020

Very truly yours,

/s/ Christopher J. Bowes  
Christopher J. Bowes, Esq